



OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

Attorneys at Law

10 Madison Avenue, Suite 400

Morristown, NJ 07960

Telephone: 973.656.1600

Facsimile: 973.656.1611

www.ogletreedekins.com

Cheryl M. Stanton

cheryl.stanton@ogletreedekins.com

August 18, 2010

BY FAX ((856) 757-5296)

Honorable Ann Marie Donio, U.S.M.J.

Mitchell H. Cohen Building


& U.S. Courthouse

4th & Cooper Streets, Room 1050

Camden, New Jersey 08101

So Ordered this 18th day of

AUGUST 2010


Ann Marie Donio, USMJ

Re: *Bell, et al. v. Lockheed Martin Corporation,*
Civil No. 1:08-CV-6292 NLH-AMD

Dear Judge Donio:

On Friday, August 13, 2010, Plaintiffs' counsel wrote to Your Honor concerning the briefing schedule for Lockheed Martin's Motion for Protective Order in connection with Plaintiffs' requests for the Depositions of Lockheed Martin's Chief Operating Officer and Chief Executive Officer and Lockheed Martin's Motion for Clarification of the June 23, 2010 Memorandum Opinion and Order concerning the temporal scope of discovery. In particular, Plaintiffs' counsel requested that the due date for their Oppositions be moved from Tuesday, September 7 to Friday, September 10 due to the Labor Day Holiday.

Counsel for Lockheed Martin has since met and conferred with Plaintiffs' counsel regarding this request. Based on this conference, and in an effort to both address the scheduling challenge presented by the Labor Day Holiday and to ensure sufficient time for the parties to complete all necessary briefing, the parties, through counsel, jointly request that the Court move the return date for the Motion on the Protective Order by one cycle from September 20 to October 4 with the following briefing schedule: (1) Motion due September 1; (2) Opposition due September 14; and (3) Reply due September 27.

Also, Plaintiffs' counsel advises us that with respect to the Motion for Clarification, Plaintiffs' counsel withdraws their request, dated August 13, 2010, to change the due date for their Opposition to that Motion and will file their response on the original due date of Tuesday, September 7.

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We appreciate Your Honor's courtesies in these matters.

Respectfully Submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.



Cheryl M. Stanton

CMS:pmu

cc: via e-mail:
Carol A. Mager, Esq.
Martha J. Fessenden, Esq.
Darnley D. Stewart, Esq.
Laura C. Mattiacci, Esq.
Andrew L. Mackerer, Esq.
Ms. Charlene Rattell
Margaret H. Campbell, Esq.
A. Craig Cleland, Esq.
Danuta B. Panich, Esq.
Michael J. Murphy, Esq.
Chris R. Pace, Esq.
Barry Simon, Esq.
Jennifer Rygiel-Boyd, Esq.
Allyson M. Smith, Esq.

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